

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

In Re:
THOMAS BENJAMIN KYLE
Debtor

CASE NO. 17-10274-JDW
CHAPTER 13

RESPONSE TO DEBTOR'S OBJECTION TO PROOF OF CLAIM

COMES NOW, Cavalry SPV I, LLC ("Respondent"), a creditor in the above-styled Chapter 13 bankruptcy proceeding, and files its Response to Debtor's Objection to Proof of Claim [Dkt #46] as follows:

1. Admitted.

2. Respondent admits that the Proof of Claim is in respect of a 2016 Yamaha PW4040A Pressure Washer ("Property"), but is without sufficient information to admit or deny the remaining allegations of this paragraph and would therefore deny the same.

3. Denied.

After answering Debtor's Objection, Respondent would affirmatively state the following:

4. Debtor purchased the Property on December 2, 2016.

5. Debtor filed his Chapter 13 petition less than two (2) months later on January 26, 2016.

6. Debtor is indebted to Respondent, and Respondent should be allowed the full amount of its proof of claim of \$3,879.75.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that this Court will find this Response to Debtor's Objection to the Proof of Claim to be well taken, will deny Debtor's Objection, and grant Respondent the sum of its proof of claim. Respondent prays for such other relief as this Court may deem proper.

Respectfully submitted,

**BENNETT LOTTERHOS SULSER
& WILSON, P.A.**

/s/ Charles Frank Fair Barbour

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CERTIFICATE OF SERVICE

I, Charles Frank Fair Barbour, do hereby certify this day that I electronically filed the above and foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Olufemi G. Salu at salu@salulawfirm.com

Locke D. Barkley at rbyrd@barkley13.com

US Trustee at USTPRegion05.AB.ECF@usdoj.gov

/s/ Charles Frank Fair Barbour